

Danone Murray Goulburn Pty Limited Privacy Policy

This Privacy Policy explains how Danone Murray Goulburn Pty Limited (ACN 143 172 258) and our related group companies including our joint venture partner (referred to here as “**Danone**”, “**we**” “**our**” and “**us**”) collect and manage your personal information.

We know that you care how your personal information is used and we recognise the importance of protecting your privacy. For the purpose of being able to provide you with our products and/or services, we handle personal information about our consumers, customers, healthcare professionals, the personal guarantors of companies to which we supply our products, job candidates and visitors to, or members of, our websites, mobile applications, social media pages and other online media and digital platforms (the “**Digital Platforms**”). This privacy policy does not relate to how all our Digital Platforms collect and manage personal information, but rather how we may collect, use, store and disclose your personal information overall.

You have no obligation to provide any personal information requested by us. However, if you choose not to, we may not be able to provide you with some of our services or products or access to some functionality of our Digital Platforms.

- 1 OUR PRIVACY COMMITMENT
- 2 HOW DO WE COLLECT PERSONAL INFORMATION?
- 3 WHAT PERSONAL INFORMATION DO WE COLLECT?
- 4 WHY DO WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?
- 5 WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO?
- 6 CUSTOMER MEMBERSHIP PROGRAMMES
- 7 AUTOMATIC DATA COLLECTION TECHNOLOGIES
- 8 OTHER TRACKING TECHNOLOGIES
- 9 THIRD PARTIES, ADVERTISING AND THIRD-PARTY LINKS
- 10 SOCIAL MEDIA AND APIS
- 11 HOW IS YOUR PERSONAL INFORMATION HELD AND SECURED?
- 12 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION
- 13 DIRECT MARKETING
- 14 ANONYMITY AND USE OF A PSEUDONYM
- 15 BUSINESS TRANSITIONS
- 16 HOW TO MAKE A COMPLAINT
- 17 CHANGES TO THIS POLICY
- 18 CONTACT DETAILS

1 OUR PRIVACY COMMITMENT

We recognise the importance of, and are committed to, managing any personal information that we collect in compliance with all applicable laws, including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (set out in Schedule 1 of the Privacy Act).

2 HOW DO WE COLLECT PERSONAL INFORMATION?

Where possible, we will collect your personal information directly from you. This collection includes when:

- you communicate with us via email, telephone (including our Customer Service line), SMS or social media;
- you interact with us on our Digital Platforms, including when you send or post queries or comments;
- you request certain products, samples or services from us;
- you fill in one of our forms, such as a customer registration form, credit or employment application;
- you participate in research activity, promotional activity, or competitions;
- you sign up for our marketing communications; or
- you otherwise correspond with us.

The information collected by us may also include personal information:

- collected by us through tracking your use of the Digital Platforms, as further detailed at 7 below; and
- collected by us through other tracking technology, as set out at 8 below.

We may monitor and record phone calls for quality control, fraud prevention, or staff training purposes and other purposes related to the purpose for your call. We will let you know at the time of the call if a call is to be recorded.

Where it is unreasonable or impracticable for us to collect the personal information from you directly, or where you have authorised such collection, we may also collect your personal information from third parties or public agencies for the purposes set out in this Privacy Policy. For example, we may need to collect personal information about you from public agencies to verify information that you have provided to us.

You may provide information to be published or displayed ("**posted**") on public areas of the Digital Platforms or transmitted to other users of the Digital Platforms or third parties (collectively "**User Contributions**"). If you use any discussion forum feature on the Digital Platforms, be aware that any personally identifiable information you submit there can be viewed and used by other Digital Platforms users. Your User Contributions are posted on and transmitted to others at your own risk. We cannot control the actions of those with whom you may choose to share your User Contributions.

3 WHAT PERSONAL INFORMATION DO WE COLLECT?

The personal information we collect varies depending upon the purpose of the collection and the product or service we are providing you. You should assume that when you provide us with information that we will retain it, unless we explicitly advise you otherwise. Generally, we collect the following types of personal information from you:

- contact information, such as name and surname, email address, address and phone numbers;
- demographic information, such as your date of birth and gender;
- consumer tastes and preferences;

- information to support the processing and delivery of product and/or service orders;
- access information, such as IP address;
- usage of our Digital Platforms, including the content you access and any services you utilise (such as search queries entered, pages you have accessed and as more particularly described at sections 7 and 8 of this Privacy Policy below);
- any other information you voluntarily provide to us (this may include health information); and
- other records of your dealings with us.

Additionally, for certain purposes, such as where you apply for employment with us, we will collect additional personal information such as your employment history, educational history and employment references.

We may also collect personal information about third parties from you, such as personal information about your family members, so that we can provide products and services to those third parties. If you provide personal information about a third-party individual to us, you must ensure that the third-party individual is aware of this Privacy Policy, understands it and agrees to accept it. If you provide personal information about a third-party individual and that individual does not have the capacity to understand and agree to these terms (for example, a child), you warrant that you are authorised to disclose that information to us for our collection, use and disclosure for the purposes set out in this Privacy Policy.

4 WHY DO WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We will collect your personal information, so we can provide you with the best advice and to provide you with a high quality of customer service. Your personal information may be used by us for any purpose which is stated to you at the time of collection, or that you otherwise authorise, and for the following purposes:

Customer Care:

- to communicate with you and respond to information that you have requested or have registered for;
- to place and process your order, provide you with your order status, and deliver your products;
- to provide you with further information about us or other Digital platforms or goods or services offered by us or third parties which we consider may be of interest to you;
- to keep the Digital Platforms relevant and of interest to users;
- to customise the Digital Platforms to your preferences and to show you advertising and information that is most relevant to you and your interests based on the information you have provided to us or we have otherwise collected;

- to develop and improve our products, services, communication methods and the functionality of our Digital Platforms;
- to carry out marketing, promotional and publicity purposes including direct marketing, market research and surveys;
- to assist in providing better services to you by tailoring them to meet your needs;
- to deal with your enquiries and requests; and
- to assess and handle any complaints or for general customer care purposes.

Sales Promotions, Competitions, Surveys and registration to attend our events:

- We may collect personal information when you respond to one of our promotions, competitions or surveys or when you register to attend an event in order to inform you if you have won a prize, to place you on a guest-list to the event, and to help us better understand what products and services you would like to receive information about in the future. Entry to a promotion or competition is usually conditional on providing the requested information. If the information is not fully supplied the entry may be void.

Market Research:

- We may collect personal information for market research, consumer insights for our products and to understand consumer tastes and preferences.

Direct Marketing:

- We may collect personal information to keep you updated about news, information and events, including new product launches and major campaigns.

Credit assessment, reporting and debt collection purposes:

- We may collect personal information about you and your credit arrangements in order to assess your credit application (including to decide whether or not to accept you as a personal guarantor of a business to which we may supply our products on credit). We may also use your personal information to collect payments and debts, including to exercise a guarantee if there has been a credit default. We may obtain and disclose your personal information to, and from, credit reporters and debt collection agencies in order to, obtain or assist with, their credit reporting and debt collection services and for our credit assessment and debt collection purposes. In applying for credit, you agree and authorise that we can do so.

Administration and legal purposes:

- We also collect personal information for internal record-keeping, accounting, IT and administration purposes and as required or authorised by law or a court / tribunal order, and to protect our legal rights.

If you provide information to us for a specific purpose, for example to apply for employment, we will use the information for that purpose.

Please note that only de-identified information/data (data where you cannot be personally identified) will be utilised for the purposes of market research, marketing planning, analysis, profiling and statistics.

5 WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO?

We may disclose your personal information to third parties in order to carry out our business activities and functions consistent with this Privacy Policy and applicable law. This may include, but is not limited to, disclosure:

- to our employees, related group companies, contractors or service providers that perform specific services or functions on our behalf, for the purposes of operating our Digital Platforms or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, credit reporting providers, data management platforms, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and archivists;
- to suppliers and other third parties with whom we have commercial relationships (including outsourced and cloud service providers), for business, marketing, maintenance, distribution of our products, and related purposes;
- to referees whose details are provided to us by job applicants;
- to professional advisors such as accountants, solicitors, insurers, lawyers, auditors, business advisors and consultants on a confidential basis;
- to any other third parties notified to you at or around the time we collect your personal information;
- to other third parties for the purposes you have consented to;
- to third parties where we believe it is necessary or appropriate to comply with any applicable law, regulation, government request or to facilitate court proceedings; or
- otherwise for the purposes set out in this Privacy Policy.

As a company with international links, we may disclose your personal information outside Australia to Danone affiliated entities and overseas third-party service providers located in New Zealand and France. We take reasonable steps to ensure that any organisations which we disclose your personal information to, whether local or overseas, are subject to appropriate contractual obligations to safeguard and protect your personal information and comply with all applicable privacy laws.

6 CUSTOMER MEMBERSHIP PROGRAMMES

Should you wish to participate in one of our customer membership programmes, we will collect (as part of the registration process) your name, surname, address, email, phone number and other information applicable to the type of membership. This is used to present products and services that may suit your needs and interests. As a member, we may send you an email to inform you about news, activities and services. You will be asked whether or not you wish to opt into such communications.

Where this feature is available, members may amend, update, and adjust personal information by personally using their username and password anytime they wish. If you forget your login name and password, you may go to the main page or member registration page and click on "Forgotten Password." The program will bring you to the "Forgotten Password" page. You will need to type in the email address or phone number used in registration, and the program will send your login name and password to your registered email address or phone number automatically.

7 AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you navigate through and interact with our Digital Platforms, we may use automatic data collection technologies via a third party to collect certain information about your equipment, browsing actions, and patterns. Some of this information may be linked to you personally. This information helps our Digital Platforms function correctly, helps us understand the needs of our users and may be used for the other purposes set out in this Privacy Policy. Examples of this information include:

- Digital Platform related traffic data, location data, logs and other communication data;
- data related to your use of the Digital Platforms. This includes the pages you visit, the resources and services that you access; the time you spend on each page, the date and time of your visit, referring pages (pages you came from or go to) and statistical and other aggregated data derived from your use of the Digital Platforms;
- information about your device, computer and network connection, including your IP address, operating system, hardware version and browser type; and
- if you allow our Digital Platforms to deliver content based on your location (for example by enabling this feature on your mobile device) we may collect location data (such as through GPS, Bluetooth, or WiFi signals) including for the automated delivery of relevant content and advertising to you.

The technologies we use for this automatic data collection may include log files, usage monitoring software and cookies. Cookies are small pieces of information that are stored on a user's device that can identify the device you are working from. The cookie file gives us details such as your IP address, platform, browser and domain (whether you are accessing the Digital Platform from Australia or elsewhere). It has a unique ID assigned to your device and enables the Digital Platform to remember your actions and preferences (such as location, language, font size and other display preferences) over a period of time. That way, you don't have to keep re-entering the information whenever you come back to our Digital Platforms or browse from one page to another. Cookies can also help customize your browsing experience. Not all cookies contain personal information but where they do, we will treat this information as personal information data in accordance with our Privacy Policy.

We, and our service providers, may use the information generated by cookies to personalise your experience on our Digital Platforms, make it easier for you to navigate our Digital Platforms, and improve your experience by storing your search, posting and other viewing and usage history, and your login details (if you choose) enabling you to use certain services as a registered user without having to log on each time. They also enable us to keep track of products or services you view so that, if you consent, we can

send you news about those products or services. We may also use cookies to provide you with certain advertisements and information which may be of interest to you. We may also use cookies to measure traffic patterns, to determine which areas of our websites have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services.

If you disable cookies it may limit your access to some of the Digital Platforms' content and features. You can choose to refuse cookies by turning them off in your browser and/or deleting them from your hard drive. You do not need to have cookies turned on to use our Digital Platforms, but your experience may be affected.

Some of our Digital Platforms use Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google](#).

8 OTHER TRACKING TECHNOLOGIES

We advertise in a number of ways, including online through managed social media presences, and on other unaffiliated sites and mobile applications. To understand how our advertising campaigns are performing, and better understand the visitors to our Digital Platforms, we may collect certain information via our Digital Platforms through our advertising service providers. We or our vendors use several common online tracking tools to collect information about our users, such as browser cookies, web beacons, and other similar technologies. The information we collect includes IP addresses, the number of page visits, pages viewed via our Digital Platforms, search engine referrals, browsing activities over time and across other websites following your visit to one of our Digital Platforms or applications, and responses to advertisements and promotions on the websites and applications where we advertise.

9 THIRD PARTIES, ADVERTISING AND THIRD-PARTY LINKS

We may allow third-party companies to collect information when you visit our Digital Platforms. This may include information that will not identify you personally (such as browsing behavior, browser type, time and date) and other information such as precise geographical location and user device identification. This information is collected to provide advertisements about goods and services likely to be of greater interest to you.

The Digital Platforms may also contain links to a variety of third-party platforms and website sources. Some of these links may request or record information from users, use cookies or other methods to collect information from you. We have no control over the content or privacy notice practices of such sites. We encourage you to review the privacy policies of such sites before engaging in any activity with them.

10 SOCIAL MEDIA AND APIs

Our Digital Platforms may include social media features such as the Facebook like button, Instagram, Twitter and widgets, share button or interactive programs that run on our site. These features may collect your IP address, which pages you visit on our site, and how long for. If you're a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information. Social media features and widgets are either hosted by a third party or hosted directly on our Digital Platform. Your interactions with these features are governed by the privacy notice of the third party providing it and to the maximum extent permitted by law we accept no responsibility for the actions of those third parties.

We may provide an application programming interface (API) to enable third party applications to interface with our Digital Platforms. Some applications enable you to interact with us through the API in a way that requires you to log in. To do this, most of these applications will direct you through a process where you are able to let the application connect to your account.

If you allow an application to connect to your account on our Digital Platforms, including if you set up your account on our Digital Platform using an API with a third party social media platform, that application will be able to access information that you can see when you are logged in to our Digital Platforms. You should only allow applications you trust to access your account on our Digital Platforms.

If you set up your account on our Digital Platforms using an API with a third party social media platform, you also consent to us obtaining and using your information from such platform.

11 HOW IS YOUR PERSONAL INFORMATION HELD AND SECURED?

Any personal information that you provide to us will be collected and held by us electronically or in paper form. We understand that the security of your personal information is important. We will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. We maintain physical and electronic security over our paper and electronic data storage. We also maintain computer and network security. For example, we use firewalls (security measures for the Internet) and other systems such as user identifiers and passwords to control access to computer systems.

If the personal information we collect is no longer needed for any purposes and we are not required by law to retain it, we will take reasonable steps to either destroy it (in a manner that ensures its confidentiality) or permanently anonymise it.

12 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

Under the Privacy Act you have certain rights of access to and correction of personal information that we hold. It is important to us that the personal information we hold about you is accurate, up to date, complete, relevant and not misleading.

In certain circumstances where you can access your own personal information via an account or membership you have with us, you will be required to follow prompts to

access, correct or update your personal information and can do so at any time by logging into your personal account. If this option is available to you directly, we will clearly mark it for ease of access. Otherwise you should contact us using the 'Contact Details' set out at <http://www.danoneultimate.com/contactus.html> or set out at the bottom of this Privacy Policy.

Please provide us with as much detail as you can about the particular information you wish to access or correct, in order to help us retrieve it. We may charge you an access fee to cover our reasonable costs of providing that information to you. We will inform you of any applicable fees before they are incurred.

In certain circumstances, we may refuse your request to access, or correct, your personal information. If that is the case, we will provide you with reasons for that decision unless it is unreasonable for us to do so. We take reasonable steps to make sure that the personal information we use is accurate, complete and up-to-date including updating personal information when we are advised by you that your personal information has changed. We will respond to all requests for access and/or correction within a reasonable time.

13 DIRECT MARKETING

By providing us with your electronic contact details (including mobile number and email address) you agree that we, and our related companies, may send you commercial electronic messages for any of the purposes set out in this Policy or otherwise disclosed to you. We will generally ask you to opt in to receiving commercial electronic messages from us.

We may use your personal information to send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *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. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us using the 'Contact Details' set out at <http://www.danoneultimate.com/contactus.html> by using the opt-out facilities provided in the marketing communications, and we will then ensure that your name is removed from our mailing list.

We may also disclose your personal information to our related bodies corporate, our other business partners and our service providers to give you information and offers about products and services offered by us or these companies that may be of interest to you. Again, we will generally ask you to opt in to receiving any such commercial electronic messages.

By opting out of receiving marketing communications, you may still receive communications from us (such as invoices and notices) in relation to the products and services you have purchased from us. This form of communication is not regarded as

“direct marketing” under the Privacy Act and the Australian Privacy Principles or a “commercial electronic message” under the *Spam Act 2003* (Cth).

14 ANONYMITY AND USE OF A PSEUDONYM

You may request at any time that you remain anonymous, or choose a pseudonym, when dealing with us. To the extent that it is lawful and practicable for us to enable you to do so, we will grant such a request. However, where you choose to remain anonymous, or choose a pseudonym, we may not be able to provide you with some services or products.

Aside from the use of a pseudonym, all material that you post on our Digital Platforms or otherwise provide to us must be true and correct in all respects.

15 BUSINESS TRANSITIONS

In the event of a change in ownership of all or a portion of us or the Digital Platforms, your personal information may be transferred to the new owner so that the business and/or Digital Platform can continue operations. In this event, your information would remain subject to this Privacy Policy.

16 HOW TO MAKE A COMPLAINT

If you wish to make a complaint about the way in which we handle your personal information, please contact our Privacy Officer using the ‘Contact Details’ set out below. We will acknowledge and investigate any complaint promptly and will respond to written complaints within a reasonable time from the date of receipt.

If you are dissatisfied with our response, you may refer the matter to the Office of the Australian Information Commissioner for guidance on alternative courses of action that may be available (see <https://www.oaic.gov.au/>).

17 CHANGES TO THIS POLICY

We may modify this Privacy Policy from time to time to reflect changes in the law and/or our business needs. When we make changes to this Privacy Policy, we will amend the revision date at the bottom of this page, and such modified or amended Privacy Policy shall be effective as to you and your personal information as of that revision date. We encourage you to periodically review this Privacy Policy.

18 CONTACT DETAILS

We take seriously the trust you put in us to properly collect, use and keep safe your personal information. If you have any questions or comments on our Privacy Policy, if you wish to access or correct the personal information we hold on you, or wish to make a complaint, please contact:

The Privacy Officer,
Danone Murray Goulburn Pty Limited,
Level 6, 636 St Kilda Rd, Melbourne VIC 3004, Australia.

Alternatively, you can send an email to our Privacy Officer at privacy.oceania@danone.com.

Privacy policy last updated on 04 June 2019.