

PRIVACY POLICY – EXTERNAL (CGPP0006)

Purpose

LaManna Premier Group (LPG), together with all members of the LPG group of companies, are committed to providing the highest levels of customer service and endeavours to interact with all stakeholders including our staff, suppliers, customers and the public in an honest, courteous, and professional manner.

We respect the privacy of the personal information that is provided to us and manage that information in accordance with relevant laws, including the *Privacy Act 1988* (Cth) (“the Act”) and the Australian Privacy Principles (**APPs**). LPG is committed to the protection of personal privacy and supports a work environment that abides by the Act and in particular the APPs.

This Privacy Policy describes how we treat any personal information (including sensitive information) that we receive about LPG employees, directors, or contractors. The objective of this policy is to provide a fair, consistent and transparent guideline for handling personal information in a professional and ethical work environment that will ensure compliance with the Act. This policy does not limit or exclude any of your rights under the Act.

Personal information of current LPG employees, directors, and contractors is covered by LPG's internal privacy policy rather than this policy. Please see the LPG intranet or contact LPG's human resources department (see section 10 below) for a copy of the internal privacy policy if relevant to you.

Key definitions

“Personal information” is information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

“Sensitive information” is personal information that includes information or an opinion about an individual's racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientation or practices, criminal record, health or genetic information or some aspects of biometric information.

Scope

This policy applies to LPG staff, contractors, and consultants of its controlled entities, being an entity where LPG holds over 50% of the share capital. Where LPG is involved in a non-controlled joint venture or other similar arrangement where it does not hold a controlling interest, LPG will make available its policy and request that the non-controlled entity adopt the key principles as part of its own policy framework.

Policy

1. Collecting your information

a) Types of information we collect

LPG may collect and hold information from different people including (but not limited to):

- customers/buyers
- suppliers and growers (and their employees and contractors)

- business partners
- shareholders
- prospective employees, directors or contractors,
- other people who deal with LPG from time to time.

We generally do not collect sensitive information however may collect it from time to time. When we do so we will collect it directly from you or where you give express consent to us collecting it from a third party.

i) Customers/buyers

If you are a current or prospective customer of LPG or buyer through LPG, we may collect:

- identifying information about you, such as your name, address, telephone number, email and/or other contact details
- payment details and other financial information
- information you provide in relation to any application process, including a credit application
- information about your transactions with LPG
- information relating to your purchase/use of our products and services.

ii) Growers/suppliers/shareholders

If you are a current or prospective grower, supplier and/or shareholder of LPG, we may collect:

- personal information about you, including your name, address, job title and contact details
- payment details and other financial information
- information you provide in relation to any application process to become a grower, supplier, or shareholder of LPG
- information about your property, including information relating to produce grown on your property
- other information about your business relationship with LPG, including information about your transactions with LPG which may be for the purpose of determining any rebates, other distributions, or bonus issues.

iii) Other

We may collect other personal information from time to time. As a general principle, we will only collect information where needed for the particular purpose the information was provided for or where required by law. In some cases, the information that we collect is business-related including, but not limited to:

- The name of the business /place of work
- Contact details for the business/place of work
- Information about the business relationship with LPG

Although this type of information is not strictly covered by the Act, we aim to manage this information responsibly and respecting any confidentiality and to protect any personal information collected by LPG in accordance with the Act.

b) How we collect your information

We will generally collect personal information from you directly including:

- from forms provided by LPG and completed by the individual
- in face-to-face meetings, email messages, telephone conversations or when an individual contacts LPG, a record of that contact may be maintained
- through any registration, application, or subscription process (or similar)
- when you commence a business or service relationship with us
- when you buy or use our services and products
- through surveillance devices that may be situated on our premises
- while conducting customer satisfaction and market research surveys

- through promotions

We may also collect your personal information from third parties where you have authorised this, it is permitted by law, or the information is publicly available. Generally, an individual has no obligation to provide any information requested by LPG. However, if an individual chooses to withhold the requested information, LPG may not be able to provide products and services that depend on the collection of this information (particularly where our collection of this information is required by law).

c) What do we use personal information for?

LPG collects personal information for a number of purposes/uses connected with our business, including:

- to conduct our business, including engaging in business with you
- to verify your identity and any registration, application, or subscription details (or similar)
- to meet our legal obligations, including our reporting obligations
- to provide news and updates to you in the future
- for marketing, publicity, or market research that we might undertake
- to manage and improve our products and services
- to respond to communication from you
- for other purposes for which you have given permission, or which is required or allowed by law.

d) Customers/buyers

If you are a customer of LPG or buyer through LPG, we may also use your personal information:

- to administer your account (including credit checks, processing, administering, and collecting payments from you)
- to provide and market our products and services, including contacting you electronically (e.g., by text or email for this purpose)
- for customer complaint handling
- to advise of new products and services, special offers or promotions (including that our agents or contractors from time to time may also use personal information to provide this information and offers).

If at any time you do not wish to receive such information from LPG or its agents, you can opt out of receiving such information or you may remove your name from our list by calling us on +61 3 9687 7725. Please allow 5 business days for this request to be processed.

e) Growers/suppliers/shareholders

If you are a current or prospective grower, supplier and/or shareholder of LPG, we may also use your personal information:

- to purchase products or services from you
- to administer your account (including administering and making payments to you)
- to process your application to become an LPG shareholder, and for purposes connected with your shareholding in LPG

We may use surveillance footage, if required, for detecting and deterring inappropriate or criminal behaviour at our premises, and monitoring the safety and security of our customers, suppliers, staff, and property.

We may also use or share information in an anonymised aggregated form, to carry out analysis of our products, services, and customer interactions for other research or promotional purposes. Under no circumstances will LPG or any related entities sell personal information to marketing

agencies without consent of the individual.

Prior to using any personal information, LPG will take reasonable steps to ensure that, having regard to the purpose for which the information is proposed to be used, it is accurate, up to date, complete, relevant and not misleading.

2. Disclosing your personal information

We may disclose your personal information to:

- our employees, directors, contractors, suppliers, customers, and agents
- related bodies corporate companies
- any business that supports our services and products, including any person that hosts or maintains our IT system or data centre, or that we use to provide our website or other services and products
- other third parties to analyse traffic at our web site, which may involve the use of cookies
- other companies or individuals who assist in providing services or who perform functions on behalf of LPG, such as mailing houses and specialist consultants
- our advisors
- credit risk assessment agencies and debt collection agencies
- any court tribunal or regulatory authority where disclosure is required or allowed by law
- any other person authorised by you or by law.

During the course of business, LPG may use a range of service providers to help maximise the quality and efficiency of LPG services and business operations. This means that individuals and organisations outside of LPG may sometimes have access to personal information held by LPG and may use this on behalf of LPG. LPG require service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purpose.

LPG will not use or disclose any personal information without consent unless:

- it is permitted by this Privacy Policy or otherwise required or authorised by law
- we believe this is necessary to provide the products or services requested
- it is necessary to implement LPG terms of service
- it is necessary to protect the rights, property or personal safety of a LPG employee, another customer, or any member of the public or LPG; or
- some or all of the assets and operations of the business are or may be transferred to another party by way of sale of some or all of LPG business.

3. Storing and protecting your personal information

LPG staff and LPG directors are required to respect the confidentiality of personal information and the privacy of individuals.

We take reasonable steps to ensure your personal information is stored securely and to keep your personal information safe from loss, unauthorised access, modification, disclosure, or other misuse. LPG employees, agents, contractors and data processors are required to respect the confidentiality of any personal information held by LPG.

Please note that LPG may use external data facilities to process or back-up its information and, as a result, may transfer personal information to other facilities for storage (including providers outside Australia). Our agreements with them prohibit the information that we collect from you being used by them in a way that we have not authorised. However, this does not change any LPG's commitment to safeguard individual privacy.

If a privacy breach occurs which has caused or may cause serious harm to you, we will notify

you of this as soon as practicable (subject to any exceptions in the Act) either directly or, if that is not reasonably practicable, by public notice.

We keep personal information only for as long as it is needed and will take reasonable steps to securely destroy or delete personal information where it is no longer required. We may be required by law to retain certain personal information.

4. Transfer of personal information outside Australia

We may from time to time transfer personal information to third parties outlined above who are located outside Australia. If we do so, we will ensure your personal information will be protected by comparable safeguards to those in Australian law. If your personal information will not be protected by comparable safeguards to those in Australian law, we will tell you that this is the case, and only transfer your personal information with your consent.

5. Accessing and correcting your personal information

Subject to certain grounds for refusal set out in the Act and APPs, you have the right to access your personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need a written request from you and evidence to confirm that you are the individual to whom the personal information relates, or you otherwise have express consent from the relevant individual.

We may refuse access where the law permits or where such disclosure would amount to a serious threat to the life, health or safety of any individual, or to public health or public safety. In respect of a request for correction, LPG will take reasonable steps to correct any information which is found to be inaccurate, incomplete or out-of-date. If an individual requires personal information that is inaccurate, incomplete or out-of-date to be changed or deleted, a request by the individual will need to be sent to LPG and LPG will take all reasonable steps to delete it unless we need to keep it for legal reasons. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to access or correct your personal information, email the LPG's Human Resources Department, hrsupport@lpgroup.com.au. Your email should provide evidence of who you are and set out the details of your request (e.g., the personal information, or the correction, that you are requesting). In some cases, there may be a charge associated with providing copies of your personal information to you. If so, we will let you know before sending your information to you. LPG's Chief People & Communications Officer has the role of ensuring that LPG complies with the principles of information privacy, addressing any enquiries about privacy and personal information made under the Act and working with the Privacy Commissioner as required on any complaints about privacy.

6. Internet use

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk. If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information to them or any other third party.

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so

that we can recognise your browser) to monitor your use of the website. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of the website.

7. Policy Definitions and Explanations

This policy document is not a transcript of the Act but a statement of policy by LPG as to how it will work to comply with the Act in respect of its employees and contractors. For more information about the Act and the APPs, you can:

- Visit the Australian Information Commissioner and Privacy Commissioner's website at <https://www.oaic.gov.au>
- Contact the office of the Privacy Commissioner on 1300 363 992 or at <https://www.oaic.gov.au/about-us/contact-us/>

8. Contact information

For any questions, comments, or concerns regarding this Privacy Policy, please contact, the Human Resources Department, hrsupport@lpgroup.com.au, 103-107 Hyde Street Footscray, Victoria 3011, +613 9687 7725.

9. Review of this Policy

This Policy will be reviewed at least every 2 years by the Audit Committee in consultation with the Chief Executive. LPG may revise and update this Privacy Policy from time to time. This Privacy Policy was issued/revised/adopted/approved as at the issue date detailed below. Any change applies from the date LPG posts the amended version to the company website.

10. Approval

This Policy and Procedure was reviewed by the Audit Committee and approved by the Board on February 2022.

11. Availability of the Policy and Related Documents

This Policy will be made available on the company website and LPG L:\Sharepoint.