



PRIVACY POLICY

One Direction ANZ Pty Ltd (ABN 22 709 321 471) is the business entity responsible for managing the Harmonised Australian Retailer Produce Scheme.

We believe in protecting the privacy and security of your personal information. This privacy policy sets out the way One Direction collects, stores, uses and discloses personal information.

Personal information is “information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not”.

You do not have to provide your personal information to us but, if you do not provide the information requested, we may not be able to provide you with our services or carry out your requests.

You may be able to deal with us without identifying yourself (i.e. anonymously or by using a pseudonym) in certain circumstances, such as when completing surveys. If you wish to do so, please contact us to find out if this is practicable in your circumstances.

The personal information One Direction collects

The personal information we collect and hold on the HARPS website and database depends on the type of interaction you have with us but could include your name, contact details (such as your phone number, address and email address), company name and position, photographs and other digital images (for example video footage or digital images). We also collect and hold audit outcomes if your business has undergone a HARPS audit.

How One Direction collects personal information

We generally collect your personal information if you choose to provide your details directly to us, for example in person, over the telephone, email, via our website, by completing online or hard copy application feedback forms or attending any of our training courses. There may be occasions when we collect your personal information from someone else, such as other entities delivering HARPS audits and training courses, social media sites and search engines.

We also automatically collect certain information when you visit our website. Such information includes your browser type, server address, operating system type, your IP address, how and when you use any of our websites, and previous websites visited. We generally use this information on an anonymous basis and do not use it to personally identify you unless required to do so by law.

During your communications with us you must not provide us with personal information about any other individual unless you have the express consent of that individual to do so, or if you are their legal representative or guardian. If you do provide us with personal information about another individual, you:

- must tell that individual that you will be providing their information to us and that we will handle their information in accordance with this privacy policy;
- must provide that individual with a copy of (or refer them to) this privacy policy; and
- Warrant that you have that individual's consent (or other legal authority) to provide their information to us.

The purposes for which One Direction collects, holds and uses personal information

We collect, hold and use personal information for the purposes for which it was provided to us (which will normally be obvious at the time One Direction collects it), other related purposes or as permitted or required by law.

Such purposes may include:

- responding to your enquiries and providing you with our services;
- processing HARPS audits
- processing forms or questionnaires you have completed either in hard copy, online, through 3rd party providers or on our website;
- processing payments;
- verifying email and IP addresses;
- providing you with information about developments for HARPS, industry events and projects that we are involved in;
- Organising and coordinating our training courses and events (including meeting dietary requirements, arranging flights, confirming speakers, etc.);
- to personalise the way on-line content is presented to you;
- to evaluate or respond to a submission, articles or correspondence that you have made or sent;
- reporting, evaluation and monitoring;
- forecasting future needs of our services and general quality assurance and training purposes;
- injury management, accidents, incident investigations and workplace health and safety; and
- Any other purposes identified at the time of collecting your information.

We will only use your personal information for the purposes for which it was initially collected, the purposes listed above, other directly related purposes and purposes to which you otherwise consent.

Direct marketing materials

We may send you direct marketing communications and information about developments in the industry, events and projects that we are involved in, and products and services that we

consider may be of interest to you. These communications may be sent in various forms, including mail, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. At any time, you may opt-out of receiving communications from us by contacting us (see the contact details below) or by using any opt-out facilities provided in the communications, and we will then ensure that your name is removed from the relevant mailing list.

How One Direction discloses personal information

We do not sell your personal information. However, we may disclose your personal information, if appropriate, for the purposes for which it was initially collected (as noted above), other directly related purposes, purposes which are otherwise authorised by law, or purposes to which you specifically consent.

Examples of entities to which we might disclose your personal information include:

- any third parties who manage data or provide services on our behalf (for example our third party IT and infrastructure service providers, legal advisors and auditors);
- relevant authorities if we have reasonable suspicion of unlawful activity or where disclosure is authorised or required by law;
- HARPS participating retailers for the purpose of reporting on audit outcomes when you as the owner have provided permission to do so;
- any other entities identified at the time of collecting your information or to which we are legally required to disclose your personal information.

Our contracts with these parties generally include an obligation for them to comply with Australian privacy law.

Security of personal information

We take reasonable steps (including any measures required by law) to ensure your personal information is protected from loss, misuse, interference and from unauthorised access, alteration or disclosure.

However, data protection and security measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your information. You must take care to protect your personal information (for example, by protecting any usernames and passwords). You should also notify us as soon as possible if you become aware of any security breaches. We have a procedure to respond to data breaches, and we will notify any affected individuals, as required under the Privacy Act.

Links to third party websites

Our website may contain links to the websites of other entities. If you click on such links, you will be transferred to the website of these entities. One Direction has no control over, and is not responsible for, the privacy practices of these entities. You should read the

privacy policy of these entities to find out how they handle your personal information when you visit their websites.

Accuracy, access and correction

We take reasonable steps to ensure that the personal information that we collect and hold is accurate, complete and up-to-date. However, we rely on you to advise us of any changes to your personal information to help us maintain accurate, complete and up-to-date information.

We will, on request, provide you with access to the personal information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any denial of access to your personal information.

To request access to your personal information or to update or correct your personal information, please contact us via the contact details provided below.

How to make a complaint

If you wish to make a complaint about One Direction, in relation to a breach of this privacy policy or the Australian Privacy Principles, you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint as well as any supporting evidence and information.

Our General Manager will investigate the issue and determine the steps that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation. If you are not satisfied with our determination, you can contact us to discuss your concerns or contact the Australian Privacy Commissioner via www.oaic.gov.au.

Revisions to One Direction's privacy policy

This privacy policy may be amended from time to time. The date of the most recent revision will appear at the bottom of this policy. If we make material changes to this privacy policy, we will notify you by email or by putting a notice on the home page of our websites.

How to contact One Direction

If you have any questions or concerns about our privacy policy or its implementation, please contact our General Manager at:

Att: The General Manager
One Direction Pty Ltd
Level 2, 570 St Kilda Road
Melbourne Vic 3004
Email: harps@harpsonline.com.au

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